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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

March 2, 2009

Reply To: OMP-145

Mike Marchand, Chairperson
Confederated Tribes of the Colville Reservation
P. O. Box 150
Nespelem, WA 99155

RE: Notification of High-Risk Determination

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Dear Mr. Marchand:

The Confederated Tribes of the Colville Reservation (CTCR) and the U. S. EPA have successfully worked together for many years in addressing environmental issues of concern to all of us. We have appreciated CTCR's partnership in Air, General Assistance, Clean Water, Brownfields, Solid Waste, and other major programs.

Unfortunately, while CTCR's environmental efforts have produced mostly successful results, your accomplishments have come with a disproportionately high administrative cost to EPA. As you are aware, over the last several years, CTCR's performance has been marred by a continuous string of one-time and repeated discrepancies and deficiencies. These have included:

- failure to account properly for fixed assets
- repeated A-133 audit discrepancies
- difficulty in resolving audit findings
- late, missing, or incorrect financial status reports
- late federal cash transactions report
- late, missing, or incomplete performance reports
- failure to perform
- spending disproportionate to performance
- failure to adhere to work plan schedule
- other

EPA's response to these issues of non-compliance has included communication via email and telephone, meetings, certified letters, implementation of a corrective action plan, temporary suspension of payments, and recoupment of disallowed costs.

This history of non-compliance continues. At present, we are attempting to obtain the required Financial Status Report (FSR) for grant assistance agreement A96011701, which ended September 30, 2008. This grant should have been closed no later than December 31, 2008; however, we are unable to close because CTCR has not been able to provide EPA with an accurate FSR. We have received both an inaccurate interim FSR, and an inaccurate final FSR. CTCR's provision of an incorrect final FSR was apparently caused in part by lack of knowledge that your cost share for this grant increased from 5% to 10% beginning October 1, 2007. Amendment #1 to this grant, dated July 9, 2007, clearly explained in two places that the statutory match was changing effective October 1, 2007. Although the amendment was signed by Mike Marchand on August 17, 2007, CTCR's program and accounting personnel have stated they were unaware of this change.

Regrettably, I find it necessary to invoke my authority under 40 CFR §31.12, and declare the Confederated Tribes of the Colville Reservation to be a "high-risk" grantee for any and all future grant amendments or new awards issued to CTCR. We will impose this designation and its accompanying restrictions one award at a time as we issue new awards or amend existing awards.

For each grant in which the high-risk condition is included, payment requests from CTCR will be processed on a reimbursable basis only. In order to receive payment for allowable work plan expenses incurred, CTCR will be required to submit legible copies of all paid commercial invoices, travel vouchers, time cards, and any other type of payment document, supported by a general ledger summary.

This is the payment condition which will be placed in each new grant or grant amendment:

"Payment Information – Colville High Risk Grantee

Under the provisions of 40 CFR §31.12, EPA Region 10 has determined the Confederated Tribes of the Colville Reservation (CTCR) to be "High-Risk" for this and all future new awards and award amendments because of previous and prolonged unsatisfactory administrative and programmatic performance. Accordingly, EPA hereby imposes the following restrictions on payment of funds under this assistance agreement:

Payments (draw downs) will be made on a reimbursement basis only. All payment requests must be accompanied by supporting documentation clearly showing how much was disbursed, for what reason(s), and to whom. Such documentation is to include, but not necessarily be limited, to the following:

1. Legible receipts or other records of payment for commercial products and services;
2. Payroll records, including properly conformed time sheets or equivalent;
3. Travel authorizations, expense vouchers and supporting documentation;
4. Standard Form 270, Request for Reimbursement.

Payment requests and supporting documentation are to be mailed to:

EPA Region 10
1200 Sixth Avenue, Suite 900
Grants Administration Unit, OMP-145
Seattle, WA 98101
Attn: Armina Nolan

EPA will not make payment unless the documentation provided fully supports the request for payment as shown on the SF 270. EPA will not authorize payment, and will return the request to CTCR if the documentation supplied is incomplete or does not support the amount requested. Should there be any differences, it is the Tribe's responsibility to correct the SF 270 or explain the differences in writing when resubmitting the request. Resubmissions must be made to EPA within 30 calendar days of the date the rejected payment request is received by the tribe. If requests are not resubmitted within 30 days, EPA may suspend this assistance agreement, in accordance with 40 CFR Section §31.43 (a)(3). The effect of suspension is that costs incurred by the grantee during the period of suspension are not allowable."

These payment restrictions will remain in effect for a minimum of two years from March 2, 2009. At the end of two years, upon submission of documentation showing that the identified deficiencies have been corrected and have not recurred at any time during this two-year period, the recipient may request removal of these restrictions and of the 'high-risk' designation. If, however, any of the deficiencies cited in the second paragraph, above, have again occurred, the two year period will begin again from the date the deficiency has been corrected."

Thank you. EPA is committed to working with the Confederated Tribes of the Colville Reservation to resolve these grant management issues. If you have any questions, please call me at 206 553-0530, or Paul Steele at 206 553-0311.

Sincerely,

Armina Nolan
Grants Management Officer

cc: Paul Steele, Grant Compliance and Enforcement, OMP-145
Bob Phillips, Grants Disputes Decision Official, OMP-145
Diana Boquist, Office of Ecosystems, Tribal and Public Affairs, ETPA-085
All Project Officers assigned to CTCR
All Grants Specialists assigned to CTCR
Las Vegas Financial Management Center



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
MANAGEMENT PROGRAMS

December 1, 2011

Mr. David Osenga,
Comptroller
Confederated Tribes of the Colville Reservation
P.O. Box 150
Nespelem, WA 99155

Re: High Risk Grant Recipient Designation

Dear Mr. Osenga,

On March 2, 2009, EPA Region 10 notified the Confederated Tribes of the Colville Reservation (Colville) that it had been designated a "High Risk" recipient for all EPA grants, in accordance with the provisions of 40 CFR Part 31.12. As set out in our letter of that date, this designation was made on the basis of unsatisfactory performance in a number of areas related to the grants active at that time. During the period since then, this designation and the payment restrictions that go with it were applied to a total of ten assistance agreements.

I have consulted with Bob Phillips of my staff, who has led the payment request review and approval effort, and he assures me that Colville has made significant changes to its grants financial management and accounting processes during the period of the High Risk restrictions. Based on his review of over 120 payment requests, it is his opinion that Colville has attained compliance with the regulatory requirements for financial management systems. He has also reviewed the periodic performance monitoring conducted by EPA Project Officers and has not identified any serious concerns. With that, I have determined that Colville no longer qualifies as a High Risk grant recipient and I am lifting the payment restrictions as of the date of this letter. All grant payments may be requested directly using the ASAP system, without prior review and approval.

EPA appreciates the consideration of your staff in complying with the requirements of the High Risk designation, especially the work that has gone into bringing your financial management systems into compliance. We value our relationship with Colville, and look forward to working with you in the future to achieve your environmental objectives.

Yours truly,


Armina Nolan, Award Official
Grants and Interagency Agreement Unit

Cc: Bob Phillips, Administrative Review Officer, GIAU
Peter Murchie, Associate Award Official, GIAU
Marge Pumphrey, LVFC
Cathy Reese, Grants Specialist, GIAU
John Schaub, Grants Specialist, GIAU
Paul Steele, Grants Specialist, GIAU
Jim Zokan, Project Officer, TTAU
Joanne Labaw, Project Officer, ECL
Justin Spenillo, Project Officer, OAWT
Helen Bottcher, Project Officer, ECL
Colville Staff (via e-mail)

April 6, 2011

MEMORANDUM

SUBJECT: Payment Approvals

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumphrey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment requests and approve payment in the amount shown:

Grant RP-96082703:

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
4/1/2011	6041-2	1/1 - 1/31/11	\$13,569.77	\$13,569.77
4/4/2011	6041-3	2/1 - 2/28/11	\$19,988.29	\$14,281.97
				\$27,851.74

Note: The approved amount for the period 2/1 – 2/28/11 is reduced by \$5,706.32, the value of the travel costs being claimed. This is because the travel being charged for had not yet been completed during or before the period covered by the request: some is indicated for March, some is indicated for April. Under high-risk conditions, payments are to be made on a reimbursement basis only. So, when the March travel has been completed and all costs incurred, include those with the March request. Same for the April travel.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 800
Seattle, WA 98101-3140

OFFICE OF
MANAGEMENT PROGRAMS

April 6, 2011

MEMORANDUM

SUBJECT: Payment Approvals

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumphrey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment requests and approve payment in the amount shown:

Grant RP-96082703:

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
4/1/2011	8041-2	1/1 - 1/31/11	\$13,569.77	\$13,569.77
4/4/2011	8041-3	2/1 - 2/28/11	\$19,988.29	\$14,281.87
				\$27,851.74

Note: The approved amount for the period 2/1 - 2/28/11 is reduced by \$5,706.32, the value of the travel costs being claimed. This is because the travel being charged for had not yet been completed during or before the period covered by the request: some is indicated for March, some is indicated for April. Under high-risk conditions, payments are to be made on a reimbursement basis only. So, when the March travel has been completed and all costs incurred, include those with the March request. Same for the April travel.

June 28, 2011

MEMORANDUM

SUBJECT: Payment Approvals

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumphrey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment requests and approve payment in the amount shown:

Grant # I-00050304

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
6/21/2011	6091-06	5/1 - 5/31/11	\$ 8,615.79	\$8,615.79

Grant # RP-96082703

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
6/23/2011	6041-6	5/1 - 5/31/11	\$15,081.39	\$15,081.39



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 800
Seattle, WA 98101-3140

OFFICE OF
MANAGEMENT PROGRAMS

June 28, 2011

MEMORANDUM

SUBJECT: Payment Approvals

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumphrey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment requests and approve payment in the amount shown:

Grant # I-00050304

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
6/21/2011	8091-08	5/1 - 5/31/11	\$ 8,615.79	\$8,615.79

Grant # RP-96082703

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
6/23/2011	8041-8	5/1 - 5/31/11	\$15,081.38	\$15,081.38

Colville Confederated Tribes – Payment Approvals for C9-00065306
7/29/10

Payment Request	Requested Amount	Approved Amount	Notes
6011-01	\$7,166.84	\$7,166.84	See #1 below.
6011-02	\$3,404.15	\$3,404.15	
6011-03	\$1,445.79	\$1,445.79	
6011-04	\$4,599.03	\$4,599.03	See #2 below.
6011-05	\$4,050.71	\$4,050.71	
6011-06	\$4,636.07	\$4,636.07	
6011-07	\$4,087.10	\$4,087.10	PP 8 Timesheet for D. Boyce missing. Will allow based on transaction ledger for this payment.
6011-08	\$3,356.58	\$3,356.58	

1. Some timesheets in this and other payment request packages show full 80 hours worked with only some of those hours charged to the specific grant account. The applicable Cost Principles under 2CFR Part 225 (formerly OMB A-87) states that where employees work on multiple activities or cost objectives, personnel activity reports or equivalent documentation must meet the following standards:

- (a) They must reflect an after the fact distribution of the actual activity of each employee,
- (b) They must account for the total activity for which each employee is compensated,
- (c) They must be prepared at least monthly and must coincide with one or more pay periods, and
- (d) They must be signed by the employee.

Does Colville use daily activity reports or something similar which shows actual hours worked under given activities, which form the basis for allocating labor costs to the appropriate funding source? If so, please provide for future payment requests. If not, please explain how these costs are allocated appropriately.

2. Some timesheets are unsigned, with the written indication that the employee was not available to sign. Per the above reference, time records must be signed by the employee. We suggest that, whenever possible, timesheets be signed by the employee prior to taking leave, or after, if the situation warrants.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 800
Seattle, WA 98101-3140

OFFICE OF
MANAGEMENT PROGRAMS

July 28, 2011

MEMORANDUM

SUBJECT: Payment Approvals

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumphrey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment requests and approve payment in the amount shown:

Grant # I-00050304

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
7/21/2011	8091-07	6/1 - 6/30/11	\$12,801.84	\$12,801.84

Grant # RP-96082703

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
7/27/2011	8041-07	6/1 - 6/30/11	\$14,884.03	\$14,884.03



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
MANAGEMENT PROGRAMS

6/22/11

MEMORANDUM

SUBJECT: Payment Approvals

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumphrey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment requests and approve payment in the amount shown:

Grant # V-97084401

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
5/23/2011	8015-02	5/1 - 5/31/10	\$56,320.06	\$56,320.06
5/23/2011	8015-03	6/1 - 6/30/10	\$128,643.33	\$128,643.33
5/23/2011	8015-04	7/1 - 7/31/10	\$230,208.48	\$230,208.48
5/23/2011	8015-05	8/1 - 8/31/10	\$70,860.02	\$70,860.02
5/23/2011	8015-06	9/1 - 9/30/10	\$150,056.88	\$150,056.88
5/23/2011	8015-07	10/1 - 10/31/10	\$82,450.07	\$82,450.07
5/23/2011	8015-08	11/1 - 11/30/10	\$85,123.84	\$85,123.84
5/23/2011	8015-09	12/1 - 12/31/10	\$105,378.50	\$105,378.50
5/23/2011	8015-10	1/1 - 1/31/11	\$143,294.35	\$143,294.35
5/23/2011	8015-11	2/1 - 2/28/11	\$121,109.91	\$121,109.91
5/23/2011	8015-12	3/1 - 3/31/11	\$138,260.34	\$138,260.34
5/23/2011	8015-13	4/1 - 4/30/11	\$113,044.27	\$113,044.27
			\$1,412,578.01	\$1,412,578.01



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 800
Seattle, WA 98101-3140

OFFICE OF
MANAGEMENT PROGRAMS

10/12/11

MEMORANDUM

SUBJECT: Payment Approvals

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumphrey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment requests and approve payment in the amount shown:

Grant # V-97084401

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
10/10/2011	6015-14	5/1 - 5/31/11	\$10,464.03	\$10,464.03
10/10/2011	6015-15	6/1 - 6/30/11	\$84,258.75	\$84,258.75
10/10/2011	6015-16	7/1 - 8/31/11	\$24,651.99	\$24,651.99
10/11/2011	6015-17	4/1 - 4/30/10	\$157,847.89	\$157,847.89
10/11/2011	6015-18	3/1 - 3/31/10	\$118,845.21	\$118,845.21
10/11/2011	6015-19	2/1 - 2/28/10	\$42,622.40	\$42,622.40
10/11/2011	6015-20	1/1 - 1/31/10	\$54,729.48	\$54,729.48
10/11/2011	6015-21	12/1 - 12/31/09	\$151,040.39	\$151,040.39
10/11/2011	6015-22	11/1 - 11/30/09	\$48,044.20	\$48,044.20
			\$670,504.34	\$670,504.34



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 800
Seattle, WA 98101-3140

OFFICE OF
MANAGEMENT PROGRAMS

11/22/11

MEMORANDUM

SUBJECT: Payment Approvals

FROM: Bob Phillips, EPA Region 10

THRU: Marge Humphrey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment requests and approve payment in the amount shown:

Grant # Y-97084401

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
11/21/2011	6015-23	10/1 - 10/31/09	\$20,112.18	\$20,112.18
11/21/2011	6015-24	9/1 - 9/30/08	\$7,427.76	\$7,427.76
11/21/2011	6015-25	9/1 - 9/30/11	\$4,004.89	\$4,004.89
Totals			\$31,544.83	\$31,544.83



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 600
Seattle, WA 98101-3140

OFFICE OF
MANAGEMENT PROGRAMS

May 12, 2011

MEMORANDUM

SUBJECT: Payment Approvals: A-96081302

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumphrey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment requests for the subject grant and approve payment in the amount shown:

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
5/8/2011	600711-06	2/1 - 2/28/11	\$ 6,348.80	\$6,348.80
5/8/2011	600711-08	3/1 - 3/31/11	\$ 10,158.04	\$10,158.04
Total				\$16,506.84



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 800
Seattle, WA 98101-3140

OFFICE OF
MANAGEMENT PROGRAMS

May 23, 2011

MEMORANDUM

SUBJECT: Payment Approvals

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumphrey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment requests and approve payment in the amount shown:

Grant # I-00050304

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
5/13/2011	6091-05	4/1 - 4/30/11	\$ 7,181.81	\$7,181.81

Grant # RP-96082703

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
5/13/2011	6041-05	4/1 - 4/30/11	\$17,432.45	\$17,432.45



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
MANAGEMENT PROGRAMS

March 14, 2011

MEMORANDUM

SUBJECT: Payment Approvals, GA-96093601

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumphrey, EPA LVFC

TO: Colville Confederated Tribes

The following payment requests have been reviewed and payments are approved, as shown:

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
2/25/2011	6087-05	2/1 - 2/28/10	\$9,248.65	\$9,248.65
2/25/2011	6087-06	3/1 - 3/31/10	\$10,180.68	\$10,180.68
2/25/2011	6087-07	4/1 - 4/30/10	\$9,828.75	\$9,828.75
2/25/2011	6087-08	5/1 - 5/31/10	\$9,272.04	\$9,272.04
2/25/2011	6087-09	6/1 - 6/30/10	\$5,538.42	\$5,538.42
2/28/2011	6087-10	7/1 - 7/31/10	\$7,448.78	\$7,448.78
2/28/2011	6087-11	8/1 - 8/31/10	\$5,037.19	\$5,037.19
2/28/2011	6087-12	9/1 - 9/30/10	\$12,216.77	\$9,688.84
Totals			\$68,781.26	\$66,233.33

Note: Payment for request # 6087-12 has been reduced by \$2,547.93 because of insufficient documentation for the expense shown on the attached.

There is no documentation to show that the services billed were actually performed as ordered and payment of the invoice was approved. Please provide that.

Also please provide a copy of the task order or contractual agreement showing the rates agreed to for the services.

Upon receipt of the requested documentation, payment for the remainder will be authorized.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 800
Seattle, WA 98101-3140

OFFICE OF
MANAGEMENT PROGRAMS

April 25, 2011

MEMORANDUM

SUBJECT: Payment Approvals: EPA Grant I-00050304

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumphrey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment request for I-00050304 and approve payment in the amount shown:

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
4/22/2011	6081-04	3/1 - 3/31/11	\$ 11,302.63	\$11,302.63



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 600
Seattle, WA 98101-3140

OFFICE OF
MANAGEMENT PROGRAMS

August 18, 2011

MEMORANDUM

SUBJECT: Payment Approvals

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumphrey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment request and approve payment in the amount shown:

Grant # I-00050304

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
8/15/2011	6091-09	7/1 - 7/31/11	\$7,915.00	\$7,915.00

Please request this amount via ASAP.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10
1200 Sixth Avenue, Suite 800
Seattle, WA 98101-3140



OFFICE OF
WATER MANAGEMENT PROGRAMS

September 28, 2011

MEMORANDUM

SUBJECT: Payment Approvals

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumphey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment requests and approve payment in the amount shown:

Grant # 1-00050304

Date	Request #	Period	Amount Requested	Amount Approved
9/28/11	0091-09	8/1 - 8/31/11	\$12,549.34	\$12,549.34

Printed on Recycled Paper



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1208 Sixth Avenue, Suite 800
Seattle, WA 98101-3140

OFFICE OF
MANAGEMENT PROGRAMS

October 24, 2011

MEMORANDUM

SUBJECT: Payment Approvals

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumphrey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment request and approve payment in the amount shown.

Grant # I-00050304

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
10/20/11	8091-10	8/1 - 9/30/11	\$41,034.29	\$41,034.29

Please request this amount via ASAP.

Payment Approval - Colville Confederated Tribes

RP-96082702

March 14, 2011

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
3/7/2011	6041-7	4/1 - 4/30/10	\$17,374.54	\$17,374.54
3/7/2011	6041-8	3/1 - 3/31/10	\$17,481.97	\$17,481.97
3/7/2011	6041-9	6/1 - 6/30/10	\$14,393.28	\$14,393.28
3/7/2011	6041-10	7/1 - 7/31/10	\$19,269.02	\$19,269.02
Total Approved				\$68,518.81



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 800
Seattle, WA 98101-3140

OFFICE OF
MANAGEMENT PROGRAMS

May 18, 2011

MEMORANDUM

SUBJECT: Payment Approvals: RP-96082702

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumpfrey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment requests and approve payment in the amount shown.

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
5/1/2011	6041-11	8/1 - 8/31/10	\$21,141.88	\$21,141.88
5/1/2011	6041-12	8/1 - 8/30/10	\$21,537.92	\$21,537.92
5/1/2011	6041-13	11/1 - 11/30/10	\$115,991.57	\$115,991.57
5/1/2011	6041-14	12/1 - 12/31/10	\$83,717.58	\$83,717.58
Total Approved				\$242,388.93

My understanding is there were no charges for the period 10/1 - 10/31/10. This is the final payment request and approval for this grant.

Submitted as Requested Payment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 600
Seattle, WA 98101-3140

OFFICE OF
MANAGEMENT PROGRAMS

August 24, 2011

MEMORANDUM

SUBJECT: Payment Approvals
FROM: Bob Phillips, EPA Region 10
THRU: Marge Pumphrey, EPA LVFC
TO: Colville Confederated Tribes

I have reviewed the following payment requests and approve payment in the amount shown:

Grant # RP-96082703

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
8/18/11	8041-08	7/1 - 7/31/11	\$17001.12	\$17001.12

Please request the approved amount via ASAP



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 600
Seattle, WA 98101-3140

OFFICE OF
MANAGEMENT PROGRAMS

November 9, 2011

MEMORANDUM

SUBJECT: Payment Approvals
FROM: Bob Phillips, EPA Region 10
THRU: Marge Pumphrey, EPA LVFC
TO: Colville Confederated Tribes

I have reviewed the following payment requests and approve payment in the amount shown:

Grant # RP-96082703

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
11/3/11	8041-10	8/1 - 8/30/11	\$117,238.28	\$117,238.28

Please request the approved amount via ASAP



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
MANAGEMENT PROGRAMS

November 30, 2011

MEMORANDUM

SUBJECT: Payment Approvals
FROM: Bob Phillips, EPA Region 10
THRU: Marge Pumphrey, EPA LVFC
TO: Colville Confederated Tribes

I have reviewed the following payment requests and approve payment in the amount shown:

Grant # RP-96082703

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
11/28/2011	8041-11	9/1 - 9/30/11	\$33,813.87	\$33,813.87

Grant # RP-96082704

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
11/28/2011	804112-1	10/1 - 10/31/11	\$16,026.37	\$16,026.37

Please request the approved amounts via ASAP

February 28, 2011

Colville Tribe Approved Payment Requests: A-96081301

Request #	Period	Amount Requested	Amount Approved
6007-1	10/1 - 10/31/09	\$4,163.29	\$4,163.29
6007-4	1/1 - 1/31/10	\$6,855.65	\$6,855.65
6007-8	3/1 - 3/31/10	\$9,457.55	\$9,457.55
6007-9	4/1 - 4/30/10	\$8,771.01	\$8,771.01
6007-10	5/1 - 5/31/10	\$5,187.17	\$5,187.17
6007-11	6/1 - 6/30/10	\$8,018.07	\$8,018.07
6007-12	7/1 - 7/31/10	\$16,102.07	\$16,102.07
6007-13	8/1 - 8/31/10	\$7,904.06	\$7,904.06
6007-14	9/1 - 9/30/10	\$23,068.44	\$23,068.44
6007-15	6/1 - 6/30/09	\$11,575.55	\$11,575.55
6007-6	8/1 - 8/31/09	\$1,276.71	\$1,276.71
6007-7	9/1 - 9/30/09	\$4,957.21	\$4,957.21
			\$187,336.78

Note concerning request #6007-14:

There is some inconsistency in the documentation for an expense in the amount of \$7,960.14 paid to Don Kruse Electric. On page 2 of the payment package this expense is classified as "Supplies," while on page 3 it is listed as "Consultant Service." This last is probably closer, but reviewing the payment documentation it is clear that this is for a contracted service. Though I am approving the payment, I would not normally consider the supporting documentation for this expense to be adequate. The invoice does not indicate specifically what services were provided or a break down of the costs, only a lump sum amount. It does reference a PO # and a proposal #, which is what leads me to believe this is a contract. Absent any more detailed information, for payment of contracted services I would expect to see a copy of the PO or similar which specified the work to be done and the agreed to rates.

Thanks



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
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OFFICE OF
MANAGEMENT PROGRAMS

4/27/11

MEMORANDUM

SUBJECT: Payment Approvals

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumphrey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment request and approve payment in the amount shown:

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
4/26/2011	6041-4	3/1 - 3/31/11	\$24,685.63	\$24,685.43



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 600
Seattle, WA 98101-3140

OFFICE OF
MANAGEMENT PROGRAMS

June 8, 2011

MEMORANDUM

SUBJECT: Payment Approvals

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumphrey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment request and approve payment in the amount shown:

A-96081302

Date Rec'd	Request #	Period	Amount Requested	Amount Approved
5/31/2011	800711-07	4/1 - 4/30/11	\$ 5,871.77	\$5,871.77

Approved Colville Payment Requests – 2/23/11
Grant I-00050303

Date Rec'd	Request #	Period	Amount Approved
2/9/2011	6091-13	7/1 - 7/31/09	\$27,018.28
2/9/2011	6091-14	8/1-8/31/09	\$14,755.66
2/9/2011	6091-15	9/1 - 9/30/09	\$35,330.01
2/23/2011	6091-12	9/1 - 9/30/10	\$16,374.15
TOTAL			\$93,478.12

Colville Confederated Tribes – Payment Approvals for L-00050303
11/30/10

Request #	Amount Requested	Amount Approved
6091-01	\$10,038.55	\$10,038.55
6091-02	\$9,480.27	\$9,480.27
6091-03	\$12,314.40	\$12,314.40
6091-04	\$11,483.73	\$11,483.73
6091-05	\$4,767.40	\$4,767.40
6091-06	\$18,587.29	\$18,587.29
6091-08	\$7,480.45	\$7,480.45
Total	\$72,172.09	\$72,172.09

Colville Confederated Tribes – Payment Approvals for:
L-00058303
12/14/10

Request #	Period	Amount Requested	Amount Approved
0091-09	6/1 - 6/30/10	\$8,223.61	\$8,223.61
0091-10	7/1 - 7/30/10	\$24,738.03	\$24,738.03
0091-11	8/1 - 8/30/10	\$15,428.01	\$15,428.01
Total		\$48,389.65	\$48,389.65

Colville Confederated Tribes - Payment Approvals for:
I-00050303
12/22/10

Request #	Period	Amount Requested	Amount Approved
6081-07	4/1- 4/30/10	\$7,428.78	\$7,428.78
Total		\$7,428.78	\$7,428.78

Colville Confederated Tribes – Payment Approvals for GA-96093601
7/28/10

Payment Request	Requested Amount	Approved Amount	Notes
6087-01	\$7,857.89	\$7857.89	
6087-02	\$8,230.73	\$8230.73	
6087-03	\$9,105.10	\$8694.22	\$410.88 travel for Lower Columbia River RI/FS is not allocable to this grant.
6087-04	\$12,920.97	\$12,920.97	See below

The method of tracking and accounting for comp time is not clear. Does the "Comp Accrued" line on the time report mean that previously accrued time is being used during that pay period, or is that when the comp time is earned? Why is comp time not tracked in the lower right box, which shows other accruals?

Colville Confederated Tribes – Payment Approvals 7/20/10

Grant	Payment Request	Requested Amount	Approved Amount
RP-96082702	6041-3	\$13,522.83	\$13,324.77
RP-96082702	6041-4	\$23,535.06	\$23,535.06
RP-96082702	6041-5	\$12,588.30	\$11,305.86
A- 96081301	6007-2	\$4,528.97	\$4,528.97
A- 96081301	6007-3	\$4,820.57	\$4,820.57
A- 96081301	6007-5	\$5,454.48	\$5,454.48



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
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OFFICE OF
MANAGEMENT PROGRAMS

March 30, 2011

MEMORANDUM

SUBJECT: Payment Approvals

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumphrey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment requests and approve payment in the amount shown:

Grant RP-96082703:

Request #	Colville Package #	Period	Amount Requested	Amount Approved
6041-1		10/1 - 12/31/10	\$222,031.91	\$108,040.34

Note: the approved payment amount is reduced by \$115,991.57 in out of period costs for consultant services provided by Fulcrum for the period 8/28/10 – 9/24/10. The approved project and budget period for RP-96082703 begins 10/1/10. These costs should be charged to the previous grant.

Colville Confederated Tribes – Payment Approvals for: RP-96082702
7/29/10

Payment Request	Requested Amount	Approved Amount	Notes
6041-8	\$12,251.74	\$12,251.74	Hertz charge for \$121.70 – there is no documentation approving this charge and establishing its allocability to the grant – Travel Authorization or something similar – or voucher for its payment. I will allow for this payment, but must have better documentation in future.

March 29, 2011

MEMORANDUM

SUBJECT: Payment Approvals

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumphrey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment requests and approve payment in the amounts shown:

Grant: A-96081302

Request #	Colville Package #	Period	Amount Requested	Amount Approved
600711-01	1942-00	10/1 - 10/31/10	\$ 5,535.11	\$5,535.11
600711-02	1944-00	11/1 - 11/30/10	\$ 5,282.61	\$5,282.61
600711-03	1949-00	12/1 - 12/31/10	\$ 5,922.74	\$5,922.74
600711-04	1958-00	1/1 - 1/31/11	\$ 5,388.05	\$5,388.05
Total				\$22,128.51

Grant: GA-96093601

Request #	Colville Package #	Period	Amount Requested	Amount Approved
6087-13	1978-001	10/1 - 10/31/10	\$8,252.85	\$8,252.85
6087-14	1979-001	11/1 - 11/30/10	\$35,539.85	\$35,539.85
6087-15	1980-001	12/1 - 12/31/10	\$13,070.92	\$13,070.92
6087-16	1981-001	1/1 - 1/31/11	\$9,363.00	\$9,363.00
Total				\$66,226.62



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March 29, 2011

MEMORANDUM

SUBJECT: Payment Approvals

FROM: Bob Phillips, EPA Region 10

THRU: Marge Pumphrey, EPA LVFC

TO: Colville Confederated Tribes

I have reviewed the following payment requests and approve payment in the amounts shown:

Grant: A-96081302

Request #	Colville Package #	Period	Amount Requested	Amount Approved
800711-01	1942-00	10/1 - 10/31/10	\$ 5,535.11	\$5,535.11
800711-02	1944-00	11/1 - 11/30/10	\$ 5,282.61	\$5,282.61
800711-03	1949-00	12/1 - 12/31/10	\$ 5,922.74	\$5,922.74
800711-04	1958-00	1/1 - 1/31/11	\$ 5,388.05	\$5,388.05
Total				\$22,128.51

Grant: GA-96093601

Request #	Colville Package #	Period	Amount Requested	Amount Approved
6087-13	1978-001	10/1 - 10/31/10	\$8,252.85	\$8,252.85
6087-14	1979-001	11/1 - 11/30/10	\$35,539.85	\$35,539.85
6087-15	1980-001	12/1 - 12/31/10	\$13,070.92	\$13,070.92
6087-16	1981-001	1/1 - 1/31/11	\$8,383.00	\$8,383.00
Total				\$65,226.62